

United States District Court
Southern District of Texas
Corpus Christi Division

United States Courts
Southern District of Texas
FILED

APR 30 2020

David J. Bradley, Clerk of Court

Bobbie David Haverkamp
Plaintiff et al

vs

Civil Action 2:17-cv-18

Correctional Manager
Health Care Committee of 2020
for UTRB

Defendants

Plaintiff's Memorandum
in Support of Motion for
Temporary Restraining Orders.

Plaintiff gently presents/ask the Court to
gently grant a motion for a temporary
Restraining order against defendants.

Argument

Your Honor, as the CMHC Committee of 2020
assumes the duties of Health Care, the Plaintiff
is well aware the 2020 Committee has a lot
on their plate and deserves as much restraint
as possible with Court Action.

The Court is well aware that the CMHC of 2019 stop all counseling for Gender Dysphoria and the resulting trouble, an example of this trouble is found in Legal Claim 16 of the amend Pleadings.

The Plaintiff ask for a TRO for the Plaintiff and Transgenderes of the UTHB-Gender Clinics of Dr. Gordon to grow their hair long to shoulder length.

This small action would provide immediate medical and mental health relief for those suffering from Gender Dysphoria.

Granting the TRO will not offend the Dignity of the State of Texas. Attorney for the Defendants Honorable Garcia is well aware Texas lets offenders grow their hair long for religious purposes.

The Defendants already have in place the Policy to let Transgenderes grow their hair to shoulder length for medical reasons, it was only the cantankerous of the CMHC of 2019 that prevented the "Significant Relief" of the 5th Circuits ruling in Gibson/Collins to be put into play.

Your Honor, human hair only grows about a inch a month so it will take time to get to shoulder length but the TRO would allow

few visible relief for mental health for those who suffer with Gender Dysphoria. A person that says "I've started" is of a different mental of one that says "No one cares". The one with hope you find alive in the morning, the one that mental say "No one cares", they are found swing by their necks - dead.

This is what the TRO will do, Right Now.

This TRO is in the best interests of the public and is not against public interest.

Under Ingraham-v-Alex standard the Plaintiff, et al has no adequate remedy of law that is imminent and the horizon.

Civil Action 2:17-cv-18 has been in motion for 42 months, the State will answer May 18, 2020 promptly with a Motion for Summary Judgment as a matter of law and the Court has set dates thru Sept 4, 2020 (50 F3d 898, 900 - 11th Cir)

There is a substantial likelihood that the Plaintiff, et al will prevail on the merits of "Significant Relief" as outlined by the 5th Circuit as part of the non-invasive treatments for Gender Dysphoria. (Ingraham 50 F3d @ 900)

The 5th Circuit in Gibson/Collins supra, with the adoption of Kosilek has already establish that giving the Plaintiff the right to wear her hair to shoulder length is within the bounds of good medicine for transgenders and will provide significant relief to those who suffer from Gender Dysphoria.

Your Honor, I pray the Court consult with Attorney Garcia of The Texas Attorney General Office for his agreement then issue a TRO within 2 weeks

So Prays the Plaintiff
Ms Bobbee

4-26-20

Stiles Unit.

Certification of Service

The Plaintiff places Certification of Service with the Clerk of Court there is no Carbon Paper, everything is short due to the Virus. We are on Quarantine lockdown, 2 cases reported on Stiles.

Please forward to :

Honorable Garcia
Texas Attorney General
Law Enforcement Division
P.O. 12548
Austin, Texas. 78711-2548

So swears the Plaintiff this was in the prison mail box 4-26-20.

Mr. Bobbie